

REBECCA SUGERMAN

(b) (6)

PROFESSIONAL ASSOCIATIONS

State Bar of California, 2001

PROFESSIONAL EXPERIENCE

U.S. Environmental Protection Agency, Office of Regional Counsel

Attorney-Advisor

San Francisco, CA

June 2003 - Present

- Complex administrative law practice, with a specialty in Resource Conservation and Recovery Act (RCRA) hazardous waste management, encompasses drafting and filing administrative complaints; writing administrative orders directing investigation and corrective action using various RCRA authorities; negotiating and drafting administrative consent agreements and final orders resolving civil penalty liability; and implementing innovative ideas for environmentally beneficial solutions such as Supplemental Environmental Projects in conjunction with the resolution of enforcement actions.
- Provide legal advice and policy recommendations on legal matters arising in the Region. Active in cases brought pursuant to EPA National Initiatives, including Financial Assurance, Mineral Processing, and export of electronic waste. Member of national work groups for financial assurance and bankruptcy.
- Partner with the Department of Justice on matters in judicial civil litigation, including drafting summary judgment motions and complaints; negotiating consent decrees; researching corporate relationships and financial viability to determine status of liable parties; navigating complex bankruptcy issues in Chapter 7, Chapter 11, and Chapter 15 cases; and selecting expert witnesses.
- Partner with States and Native American Tribes in addressing environmental enforcement issues, including complex jurisdictional questions; appropriate authorities for corrective action, underground storage tank cleanups, and addressing groundwater contamination; and issues arising in relation to the authorized hazardous waste programs implemented by states in Region 9.

Beveridge & Diamond, P.C.

Associate

San Francisco, CA

Summer 1999, October 2001 - June 2003

Provided compliance counseling to clients regarding development restrictions under local zoning ordinances and municipal codes. Provided litigation support for complex case involving multiple defendant chemical manufacturers and local dry cleaners sued by a city for groundwater contamination. Drafted petition for variance to RCRA Land Disposal Restrictions. Researched and drafted memorandum analyzing California Coastal Commission jurisdiction over development projects. Provided litigation support for case involving Endangered Species Act and Clean Water Act claims.

Tetra Tech EM Inc.

Environmental Scientist, Project Manager

San Francisco, CA

May 1992 - August 1998

- **Project manager.** Wrote reports summarizing and evaluating environmental data and describing potential risks to human health at Bay Area Navy bases. Recommended lease restrictions necessary for lease of industrial and residential areas. Presented conclusions of reports at public meetings. Managed staff and subcontractors. Acted as liaison to clients and regulatory agencies.

- **Environmental scientist.** Wrote sections of Remedial Investigation Reports. Sampled soil and groundwater at Comprehensive Environmental Resource Compensation and Liability Act (CERCLA or Superfund) facilities. Assessed effectiveness of the State of California's underground storage tank (UST) program for EPA's Region 9 Office of Underground Storage Tanks.
- **CERCLA Potentially Responsible Party searches.** Wrote CERCLA enforcement memoranda for EPA Region 9. Researched PRP's operating procedures and use of chemicals at each facility, and established a case connecting a PRP's facility practices with soil and groundwater contamination.

San Francisco BayKeeper
Administrative Assistant

San Francisco, CA
January 1991 to January 1992

Provided administrative assistance to the executive director, and acted as liaison between volunteers and staff. Managed volunteer database.

EDUCATION

U.C. HASTINGS COLLEGE OF THE LAW, San Francisco CA

Juris Doctor, 2001

Hastings West-Northwest Journal of Environmental Law and Policy, Member, 1999-2000

Published article, *The Mojave Basin Physical Solution: It's a good idea, but is it good law?*

Extern, California State Attorney General, Natural Resources Division, Spring 2000

Researched and drafted memoranda analyzing various California Environmental Quality Act issues.

Research Assistant, Professor Clifford Rechtschaffen, U.C. Hastings College of the Law, Spring 1999

Researched topics for a book on environmental enforcement. Edited citations in article for publication.

UNIVERSITY OF SAN FRANCISCO, San Francisco, CA

Masters of Science in Environmental Management, 1994

OBERLIN COLLEGE, Oberlin, OH

Bachelor of Arts in English and French Literature, 1990

MIDDLEBURY COLLEGE, Middlebury, VT

Intensive French Language Study, Summer 1987

AWARDS

National Notable Achievement Award: RCRA Corrective Action Gila River Indian Community/North Central Groundwater Project	2016
Silver Medal for Superior Service Red Hill Underground Storage Tank facility	2016
National Notable Achievement Award: RCRA Corrective Action Outstanding Regional Efforts to Support State or Tribal RCRA Programs	2009
National Notable Achievement Nominee - Land Revitalization Team - Planting the Seeds Saipan Unexploded Ordnance Team	2008
National Honor Award: Non-Supervisory Award for Advancing Environmental Protection For notable contributions to environmental protection in Indian country and the use of innovative enforcement tools	2005
Regional Administrator's Award For innovation on RCRA Biennial Report Expedited Settlement Project	2003